

STEVEN A. GIBSON, ESQ.

Nevada Bar No. 6656

[sgibson@righthaven.com](mailto:sgibson@righthaven.com)

J. CHARLES COONS, ESQ.

Nevada Bar No. 10553

[ccoons@righthaven.com](mailto:ccoons@righthaven.com)

JOSEPH C. CHU, ESQ.

Nevada Bar No. 11082

[jchu@righthaven.com](mailto:jchu@righthaven.com)

Righthaven LLC

9960 West Cheyenne Avenue, Suite 210

Las Vegas, Nevada 89129-7701

(702) 527-5900

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-  
liability company,

Plaintiff,

v.

PAULA BLISS, an individual,

Defendants.

Case No.: 2:10-cv-1245

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

Righthaven LLC (“Righthaven”) complains as follows against Paula Bliss (“Ms. Bliss”),  
on information and belief:

**NATURE OF ACTION**

1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.

**PARTIES**

2. Righthaven is, and has been at all times relevant to this lawsuit, a Nevada limited-  
liability company with its principal place of business in Nevada.



1           12.     At all times relevant to this lawsuit, Ms. Bliss knew that the Work was originally  
2 published in the Las Vegas *Review-Journal*.

3           13.     At all times relevant to this lawsuit, Ms. Bliss knew that the Infringement was and  
4 is of specific interest to Nevada residents.

5           14.     The subject matter, at least in part, of the Work and the Infringement, is the  
6 Nevada Gaming Board's warning for Nevada-based casinos to avoid online gambling  
7 transactions.

8           15.     Ms. Bliss' display of the Infringement was and is purposefully directed at Nevada  
9 residents.

10          16.     Ms. Bliss' contacts with Nevada are continuous and systematic because Ms. Bliss  
11 regularly published and publishes, on the Website, content emanating from Nevada-based daily  
12 publications.

13          17.     Ms. Bliss' contacts with Nevada are continuous and systematic because Ms.  
14 Bliss' Website is, and has been at all relevant times to this lawsuit, sponsored by gambling and  
15 gaming focused businesses that are of specific interest to Nevada-based residents.

16  
17                                 **VENUE**

18          18.     The United States District Court for the District of Nevada is an appropriate  
19 venue, pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events giving rise to  
20 the claim for relief are situated in Nevada.

21  
22                                 **FACTS**

23          19.     The Work constitutes copyrightable subject matter, pursuant to 17 U.S.C. §  
24 102(a)(1).

25          20.     Righthaven is the owner of the copyright in and to the Work.

26          21.     The Work was originally published on June 3, 2010.

27          22.     On July 21, 2010, the United States Copyright Office (the "USCO") granted  
28 Righthaven the registration to the Work, copyright registration number TX0007173597 (the

1 “Registration”) and attached hereto as Exhibit 5 is evidence of the Registration in the form of a  
2 printout of the official USCO database record depicting the occurrence of the Registration.

3 23. On or about June 4, 2010, Ms. Bliss displayed, and continues to display, the  
4 Infringement on the Website.

5 24. Ms. Bliss did not seek permission, in any manner, to reproduce, display, or  
6 otherwise exploit the Work.

7 25. Ms. Bliss was not granted permission, in any manner, to reproduce, display, or  
8 otherwise exploit the Work.

9  
10  
11 **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

12 26. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
13 25 above.

14 27. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17  
15 U.S.C. § 106(1).

16 28. Righthaven holds the exclusive right to prepare derivative works based upon the  
17 Work, pursuant to 17 U.S.C. § 106(2).

18 29. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
19 17 U.S.C. § 106(3).

20 30. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
21 U.S.C. § 106(5).

22 31. Ms. Bliss reproduced the Work in derogation of Righthaven’s exclusive rights  
23 under 17 U.S.C. § 106(1).

24 32. Ms. Bliss created an unauthorized derivative of the Work in derogation of  
25 Righthaven’s exclusive rights under 17 U.S.C. § 106(2).

26 33. Ms. Bliss distributed, and continue to distribute, an unauthorized reproduction of  
27 the Work on the Website, in derogation of Righthaven’s exclusive rights under 17 U.S.C. §  
28 106(3).



1 c. All financial evidence and documentation relating to Ms. Bliss' use of the  
2 Work;

3 3. Direct the current domain name registrar, Tucows, and any successor domain  
4 name registrar for the Domain to lock the Domain and transfer control of the Domain to  
5 Righthaven;

6 4. Award Righthaven statutory damages for the willful infringement of the Work,  
7 pursuant to 17 U.S.C. § 504(c);

8 5. Award Righthaven costs, disbursements, and attorneys' fees incurred by  
9 Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;

10 6. Award Righthaven pre- and post-judgment interest in accordance with applicable  
11 law; and

12 7. Grant Righthaven such other relief as this Court deems appropriate.  
13

14 **DEMAND FOR JURY TRIAL**

15 Righthaven requests a trial by jury pursuant to Fed. R. Civ. P. 38.

16 Dated this twenty-sixth day of July, 2010.  
17

18 RIGHTHAVEN LLC  
19

20 By: /s/ J. Charles Coons  
21 STEVEN A. GIBSON, ESQ.  
22 Nevada Bar No. 6656  
23 J. CHARLES COONS, ESQ.  
24 Nevada Bar No. 10553  
25 JOSEPH C. CHU, ESQ.  
26 Nevada Bar No. 11082  
27 9960 West Cheyenne Avenue, Suite 210  
28 Las Vegas, Nevada 89129-7701  
Attorneys for Plaintiff